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**FEDERAL COMMUNICATIONS COMMISSION**

Washington, D.C.

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JUL 28 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Implementation of Section 17	)	ET Docket No. 93-7
of the Cable Television	)	
Consumer Protection and	)	
Competition Act of 1992	)	
	)	
Compatibility Between Cable	)	
Systems and Consumer Electronics	)	
Equipment	)	

OPPOSITION OF CABLEVISION INDUSTRIES CORPORATION

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July 28, 1994

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OPPOSITION OF CABLEVISION INDUSTRIES CORPORATION

Cablevision Industries Corporation ("CVI"), by its attorneys, hereby submits its Opposition to a Petition for Reconsideration and Clarification ("*Petition*") in this proceeding filed by the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG"). CVI is the ninth largest cable operator with operations in 18 states and approximately 1.3 million subscribers. The company has used addressable converters for nearly 13 years and currently has about 600,000 addressable converters in use in its systems. CVI installation and service personnel visit between 300,000 and 500,000 homes each year in the course of conducting business. This experience, and that of other cable operators, makes it uniquely qualified to speak to the issues raised by the EIA/CEG Petition.

On page one of its *Petition* the EIA/CEG states:

*The clarifications and alterations proposed herein are needed to protect consumers and manufacturers against unnecessary costs and to avoid unnecessary regulation while assisting in the development of a competitive marketplace, avoiding unnecessary consumer confusion, and furthering the compatibility of cable systems with consumer electronics products. The proposed alterations and clarifications are not at odds with the spirit of the rules embodied in the Order; however, they will prevent unnecessary harm to industry and to the public in the implementation of the rules.*

CVI respectfully disagrees with the EIA/CEG and submits the proposed changes are more substantive than the EIA suggests. Furthermore, the changes can and will cause consumer confusion and some of the suggested changes in the technical performance of equipment will result in substandard performance of consumer electronics equipment when connected to cable systems.

**I. Negative Labeling Is A Necessary Protection For Consumers.**

The EIA/CEG is opposing negative labeling requirements claiming it is a serious mistake to impose negative labeling requirements on consumer electronics products. See *Petition* at 5, para 1. By its own admission, the consumer electronics industry has been unable to control "commission compensated" sales personnel who often say what ever is needed to close a sale. They are often under-trained in the issues encountered in the living room environment and consumer electronic equipment retailers' personnel rarely if ever visit customers' homes as part of a sale. As a result, the very

people who interact with consumers in fostering sales of the equipment at issue are themselves distanced and insulated from important sources of potential customer feedback and experiences. With their limited exposure to the ultimate customer, consumer electronics manufacturers have little information from consumers and little or no incentive to fix potential problems such as inadequate shielding against signal ingress, tuner overload, local oscillator back-feeds onto cable systems and adjacent channel interference problems. Labeling requirements will not and cannot provide a simple cure-all for these problems, but appropriate labeling can go a long ways in helping consumers understand the particular attributes and possible limitations of any given receiver or VCR. Consumer equipment displays in stores often use laser disk players to input single channel sources of video programming. Only after a consumer makes a purchase and tries to use the equipment in the home environment do short comings manifest themselves. Labeling can help in the initial purchase decision and it can assist consumers in understanding the realities of particular equipment limitations once in the home. Access to pre-printed, factual descriptions is important. The cable industry has long been the target of consumer frustration in this area and the industry has historically been forced to contend with angry subscribers and the task of providing set-top converters to overcome limitations of so called "cable ready" consumer electronics products.

CVI believes the Commission has acted properly in protecting consumers in an area where the consumer electronics industry has been unable to police itself. Consumers lack the technical sophistication to ask the right questions when products are

being considered for purchase. Without the Commission's labeling requirement, sale of inadequate products to the buying public will continue.

## **II. Channel Mapping Techniques Serve Subscriber Interests.**

By its *Petition*, the EIA/CEG suddenly has changed its position regarding the practice of "Channel Mapping" in Interim Standard IS-132. See Attachment A. The *Petition* does not explain why it has now taken so different a position on this issue; nor does it even concede that it has long been on the other side. CVI believes the issues relating to channel mapping are not universally understood and, perhaps, this may account for EIA/CEG's erratic behavior. Channel mapping can take two forms — static and dynamic. Static mapping is done on a quasi-permanent basis. Many cable television operators use static channel mapping features of modern converters to simplify access to certain programming and enhance programming line-ups. Most cable converters use a combination of numerical random access and channel up/down keys to select programming. With gaps in the channel line-up, as is sometimes necessary due to signal ingress and aeronautical radio frequency assignments, the channel up/down selection process results in tuning through vacant channels. Cable operators use mapping to ensure that all channels follow a consecutive numbering scheme to avoid gaps in the channel line-up. For example, channels 98 & 99 (108-120 MHz) are frequently used in system with 60 or fewer active channels. Operators map channels 98 and 99 to lower channel numbers, often to numbers corresponding to the next highest number from the last active channel on the system. To avoid consumer confusion channel up/down keys

normally follow numerical sequences for channel changes. This makes the tuning process continuous for viewers and avoids bursts of snow and noise when vacant channels are encountered.

Dynamic channel mapping is used with Impulse Pay-Per-View ("PPV") programming and Automatic Number Identification telephone ordering systems to provide viewer instructions on ordering programs and/or preview channels. To order a PPV movie, a viewer would tune to the channel for that service (Viewer's Choice on channel 60, for example). Since the viewer has not yet purchased the movie, the set-top decoder is "dynamically mapped" to an instruction or preview channel. Following instructions on the screen, the viewer can place an order for the movie. Once a viewer makes a purchase as per those instructions, the set-top decoder is activated and the subscriber is re-tuned to the actual PPV channel (Viewer's Choice on channel 60 in this example). Throughout this process, however, the subscriber's converter box channel display remains constant; in this case, it would continue to display channel 60 even though the box has actually shifted the subscriber back and forth among the relevant channels.

Similarly, set-top converter products about to be introduced have been designed to support Near Video on Demand ("NVOD") programming. In NVOD delivery, programs have multiple start times. For example, a particular movie might have start times every 10 minutes. Interested viewers would tune to an assigned channel number and receive instructions on how to order service. In effect an "order" authorizes the viewer to access the next start time. After an order is placed, the decoder would automatically tune to the channel assigned for that particular start time. Set-top remote

control units will be equipped with FWD and REV buttons that permit viewers to "navigate" among different start times for the program ordered. The FWD command will order the decoder to tune the channel carrying the program with an earlier start time. This gives the viewer the perception of stepping forward into the program — an advance of 10 minutes in the previous example. The REV command would similarly cause the decoder to "step back" to an earlier point in the program by tuning its carriage on a channel with a later start time. This approach gives the viewer the ability to "jump ahead" in a program or to review part of the program already viewed. The actual process makes use of dynamic channel mapping to give the viewer convenience of moving backward or forward in a NVOD program. Throughout the process the channel identification would remain unchanged. Without "dynamic" channel mapping viewers would need complex and likely voluminous guides giving every start time and channel number for every program offered in the NVOD schedule. Given the number of start times for each movie and potentially the large number of different movies available, consumers would face a nearly impossible task of trying to match a particular movie start time an "unmapped" channel number.

CVI has used dynamic channel mapping with instruction or preview channels for more than five years to assist viewers in ordering PPV and special event programming. CVI systems using dynamic channel mapping are shown along with the number of converters where dynamic channel mapping is used to simplify ordering programming.



<b>California</b>	
Long Beach	54,240
San Fernando Valley	72,026
<b>Florida</b>	
Cape Coral	20,047
Deland	20,456
Golden Gate	6,461
Orlando Area	8,827
Palatka	2, 785
Winter Garden	18,370
<b>Massachusetts</b>	
Fairhaven	6,688
Foxboro	16,329
<b>Michigan</b>	
Dearborn	23,335
<b>New York</b>	
Genesee	30,926
Geneva	14,695
Glens Falls	1,532
Orange County	11,933
Saratoga	3,722
Saugerties	2,775
Sullivan County	3,313
<b>Pennsylvania</b>	
Philadelphia	93,873
<b>South Carolina</b>	
Columbia	25,020
<b>Tennessee</b>	
Jackson	11,220
<b>Total Set-Top Decoders</b>	
<b>Employing Channel Mapping</b>	<b>448,573</b>

CVI's experience with more than twenty systems and nearly 450,000 decoders has proven that channel mapping, when used intelligently can make cable

services more user friendly. CVI has successfully used channel mapping with existing so-called cable ready receivers and our experience over the past five years has proven that channel mapping provides important benefits to subscribers. Based on the attached letter, it appears that EIA/CEG's desire to eliminate channel mapping may have political grounding rather than technical. On April 15, 1994, the EIA/CEG agreed to changes in the draft Interim Standard IS-132 "Cable Television Channel Identification Plan" that preserved the right to continue the use of channel mapping as follows:

*This standard is not intended to preclude channel mapping in cable systems. To provide compatibility, cable systems will follow the frequency allocations designated in the channelization plan and will seek to ensure that all channel information that is supplied by the cable system properly identifies channels by numbers as well as by signal carried. The cable operator will provide information for printed and on-screen program guides, so that subscribers can directly reference programs with the channel number plan used on cable-ready receivers.*

It now appears that EIA/CEG has reversed its position on channel mapping and has chosen to use the Commission's processes as a vehicle for implementing its change of mind. CVI believes the Commission should recognize the value of channel mapping as a tool for simplifying delivery of cable services. CVI recognizes that committees working on development of a standard for component or "set-back" decoders must necessarily address the issue of channel mapping along with many other issues.

In this regard, CVI recognizes the difficulty in preserving channel mapping capability in consumer electronic devices without a standardized method for downloading channel maps into TV sets and VCRs. In the absence of standard methods for

downloading channel maps, we believe equivalent flexibility can be achieved by implementing the capability to make tuner frequency control part of the standard handshake being jointly developed by the two industries as part of the draft decoder interface standards. Until the work of the joint engineering committees is finished, CVI believes it would be inappropriate for the Commission to act on this *Petition*.

### **III. Tuner Overload Specifications Should Not Be Reduced.**

Any consideration being given to reducing the tuner overload specifications needs to be done with an understanding that when connected to cable, the connected device becomes part of a system of processors and amplifiers, each contributing to a portion of the end of line distortion. When cable network designers establish distortion design parameters for a network, all elements of the network are taken into consideration. These include headend signal processors, any microwave or fiber optic distribution in the path, trunk and line extending amplifiers, home or apartment amplifiers that are part of the residential coaxial distribution system and the tuner of the terminating device.

Set-top converters and decoders universally provide at least 55 dB of distortion suppression when the input signal is +15 dBmV. This is the same criteria that was established in the Commission's First Report and Order in this proceeding, released last May. Should performance standards for consumer electronics equipment be reduced to a level below that for set-top converters and decoders, then customers using their TV sets or VCRs as terminating devices would receive impaired signals when compared to

termination with converters with higher performance standards. CVI's experience has shown that customers' expectations for signal quality are rising. In response, equipment and service providers must necessarily increase their performance standards. CVI recommends the Commission retain the tuner overload performance standards established in the Report and Order.

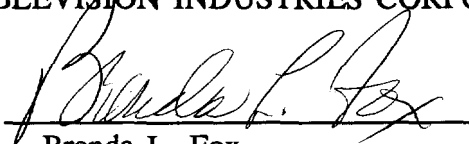
### CONCLUSION

For the foregoing reasons, the EIA/CEG Petition for Reconsideration and Clarification should be dismissed.

Respectfully submitted,

CABLEVISION INDUSTRIES CORPORATION

By:



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July 28, 1994

## EXHIBIT A



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April 15, 1994

Mr. Joseph Van Loan  
Cablevision Industries  
One Cable Vision Center, P.O. Box 311  
Liberty, NY 12754

Dear Mr. Van Loan:

Thank you for your response to the EIA ballot on draft Interim Standard IS-132 "Cable Television Channel Identification Plan." The co-chairmen Jim Farmer and Leroy Wignot have accepted your comments and will recommend the following changes to the standard: In paragraph 1.0, delete the sentence "It is intended that receivers and cable systems using this frequency allocation standard will identify each frequency allocation by its appropriate channel number", and add in its place " *This standard is not intended to preclude channel mapping in cable systems. To provide compatibility, cable systems will follow the frequency allocations designated in the channelization plan and will seek to ensure that all channel information that is supplied by the cable system properly identifies channels by numbers as well as by signal carried. The cable operator will provide information for printed and on-screen program guides, so that subscribers can directly reference programs with the channel number plan used on cable-ready receivers.*" Please let me know in writing (FAX) if this modification addresses your concern within 2 weeks of receipt of this letter. If we do not hear from you we will assume that you have accepted the proposal.

Sincerely yours,

George Hanover  
Staff Vice President, Engineering  
Consumer Electronics Group

GH:ms

CC: Jim Farmer (ESP)  
Leroy Wignot (Thomson CEC)